RENE L. VALLADARES 1 Federal Public Defender Nevada State Bar No. 11479 2 MARGARET W. LAMBROSE Assistant Federal Public Defender 3 Nevada State Bar No. 11626 411 E. Bonneville, Ste. 250 4 Las Vegas, Nevada 89101 (702) 388-6577/Phone 5 (702) 388-6261/Fax Maggie\_lambrose@fd.org 6 Attorney for Cemone Champagne Lewis 7 UNITED STATES DISTRICT COURT 8 9 10 UNITED STATES OF AMERICA, 11 Plaintiff, 12 v. 13 CEMONE CHAMPAGNE LEWIS, 14 Defendant. 15 16

Case No. 2:18-cr-00055-APG-GWF

**UNOPPOSED MOTION TO** CONDUCT A PRE-PLEA PRESENTENCING INVESTIGATION REPORT AND

## **ORDER**

Appointed counsel, Margaret W. Lambrose, Assistant Federal Public Defender, respectfully requests that a pre-plea presentence investigation report be prepared by the Department of Probation

DISTRICT OF NEVADA

1. Mr. Lewis's criminal convictions arise from cases adjudicated in Illinois. As such, it has been very difficult for the parties to accurately determine his criminal history score. Mr. Lewis's criminal history score will significantly impact his sentencing exposure, negotiations, and his decision regarding how to proceed in this matter. A pre-plea presentence report will promote judicial economy and aid in the manner in which this case is ultimately resolved.

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- 2. Undersigned counsel therefore respectfully requests this Court to issue an order that the Department of Probation conduct a pre-plea presentence investigation report
- Undersigned counsel has spoken to the prosecutor, Assistant United States Attorney, Phillip Smith regarding this request and he has no opposition. The Department of Probation has also been made aware that this request is forthcoming.

DATED this 14<sup>h</sup> day of June 2018.

RENE L. VALLADARES Federal Public Defender

By: /s/ Margaret Lambrose

MARGARET LAMBROSE Assistant Federal Public Defender Attorney for Cemone Champagne Lewis

## UNITED STATES DISTRICT COURT **DISTRICT OF NEVADA**

UNITED STATES OF AMERICA,

2:18-cr-00055-APG-GWF

Plaintiff,

**ORDER** 

vs.

CEMONE CHAMPAGNE LEWIS,

Defendant.

IT IS HEREBY ORDERED that the Probation Department will prepare a Pre-Plea Presentence Investigation Report on Defendant Cemone Champagne Lewis.

Dated: June 15, 2018.

UNITED STATES DISTRICT COURT JUDGE